

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHARLOTTE BENNETT,

Plaintiff,

v.

ANDREW M. CUOMO,
MELISSA DEROSA,
JILL DESROSIERS, and
JUDITH MOGUL,

Defendants.

22-CV-07846 (VSB) (SLC)

**ADDENDUM TO STIPULATED
AMENDED CONFIDENTIALITY
AGREEMENT AND
PROTECTIVE ORDER**

SARAH L. CAVE, Magistrate Judge:

WHEREAS, all of the parties to this action (collectively, the “Parties” and each individually, a “Party”) entered into a Stipulated Amended Confidentiality Agreement and Protective Order (the “Confidentiality Agreement”) pursuant to Federal Rule of Civil Procedure 26(c) to protect the confidentiality of nonpublic and sensitive information that may need to be disclosed in connection with discovery in this action;

WHEREAS, the Confidentiality Agreement was approved by the Court on October 27, 2023 (ECF No. 120);

WHEREAS, Paragraph 9(g) of the Confidentiality Agreement provides that information designated Confidential may be disclosed to “any person a Party retains to serve as an expert witness or otherwise provide specialized advice to counsel in connection with this action, provided such person has first executed a Non-Disclosure Agreement in the form annexed as Exhibit A” to the Confidentiality Agreement;

WHEREAS, the Parties seek to modify Paragraph 18 of the Confidentiality Agreement as to provide that any person a Party retains to serve as an expert witness or otherwise provide specialized advice to counsel in connection with this action may retain a copy of their own work product, including all notes and recordings made of any examinations the expert conducts and any reports that the expert prepares, provided that they are required to retain copies of such work product to comply with their professional obligations.

THEREFORE, Paragraph 18 of the Confidentiality Agreement shall be modified as follows:

Within a reasonable period after the conclusion of the litigation, all Confidential Discovery Material shall be returned to the respective Producing Parties or destroyed by the recipients, provided, however, that attorneys that the parties have specifically retained for this action may retain an archival copy of all materials that have been filed in this action, even if such filings include Confidential Discovery Material. Any person a Party retains to serve as an expert witness or otherwise provide specialized advice to counsel in connection with this action may retain a copy of their own work product, including all notes and recordings made of any examinations the expert conducts and any reports that the expert prepares, provided that they are required to retain copies of such work product to comply with their professional obligations.

SO STIPULATED AND AGREED.

KATZ BANKS KUMIN LLP

By: /s/ Debra S. Katz
Debra S. Katz
Rachel E. Green
Sarah Nesbitt
11 Dupont Circle, NW
Suite 600
Washington, D.C. 20036
Tel. (202) 299-1140

GLAVIN PLLC

By: /s/ Rita Glavin
Rita Glavin
Alexander S. Holland
Katherine E. Petrino
Leo Korman
156 West 56th Street, #2004
New York, New York 10019
Tel. (646) 693-5505

katz@katzbanks.com
green@katzbanks.com
nesbitt@katzbanks.com

EISENBERG & SCHNELL LLP

By: /s/ Herbert Eisenberg
Herbert Eisenberg
Laura S. Schnell
233 Broadway, Suite 2704
New York, New York 10279
Tel. (212) 966-8900
lschnell@eisenbergschnell.com
heisenberg@eisenbergschnell.com

Attorneys for Plaintiff Charlotte Bennett

rglavin@glavinpllc.com
aholland@glavinpllc.com
kpetrino@glavinpllc.com
lkorman@glavinpllc.com

SHER TREMONTE LLP

By: /s/ Theresa Trzaskoma
Theresa Trzaskoma
Allegra A. Noonan
Brachah Goykadosh
90 Broad Street
23rd Floor
York, New York 10004
Tel. (212) 202-2600
ttrzaskoma@shertremonte.com
anoonan@shertremonte.com
bgoykadosh@shertremonte.com

Attorneys for Defendant Andrew M. Cuomo

MORVILLO PLLC

By: /s/ Gregory Morvillo
Gregory Morvillo
90 Broad Street
New York, New York 10004
Tel. (646) 831-1531
gm@morvillopllc.com

GELBER & SANTILLO PLLC

By: /s/ Sarah A. Sulkowski
Sarah A. Sulkowski
52 Duane Street, 7th Floor
New York, New York 10007
Tel. (212) 227-4743
ssulkowski@gelbersantillo.com

GRUPPUSO LEGAL

By: /s/ Anthony M. Gruppuso
Anthony M. Gruppuso
Gruppuso Legal
NJ 560 Main St
Chatham, NJ 07928

Tel. (908) 451-5749
gruppuso.legal@outlook.com

Attorneys for Defendant Melissa DeRosa

ORRICK HERRINGTON & SUTCLIFFE LLP

By: /s/ Michael Delikat
Michael Delikat
Jill Rosenberg
Brianna A. Messina
51 West 52nd Street
New York, NY 10019-6412
Tel. (212) 506-5000
mdelikat@orrick.com
jrosenberg@orrick.com
bmessina@orrick.com

Attorneys for Defendant Judith Mogul

DEBEVOISE & PLIMPTON LLP

By: /s/ Jyotin Hamid
Jyotin Hamid
Mary Beth Hogan
Leah W. Rosenberg
Soren Schwab
919 Third Avenue
New York, NY 10022
Tel. (212) 909 6996
jhamid@debevoise.com
mbhogan@debevoise.com
lwrosenberg@debevoise.com
sschwab@debevoise.com

Attorneys for Defendant Jill DesRosiers

SO ORDERED. October 18, 2024


SARAH L. CAVE
United States Magistrate Judge